

BARCLAY DAMON ^{LLP}

Scott P. Rogoff
Partner

October 28, 2021

VIA E-Mail

Hon. Elizabeth A. Wolford
United States District Judge
100 State Street
Rochester, NY 14614

Re: Re: Umbrino, et. al. v. L.A.R.E. Partners Network, Inc. d/b/a L.A.R.E. Partners f/k/a
List Assist Real Estate, Inc., et al
United States District Court – Western District of New York
Civil Action No. 6:19-cv-6559 (EAW/MWP)

Dear Judge Wolford:

As you are aware, our office represents Defendants L.A.R.E. Partners Network, Inc. d/b/a L.A.R.E. Partners f/k/a List Assist Real Estate, Inc., Real Agent Pro, LLC f/k/a L.A.R.E. Marketing LLC, L.A.R.E. Properties, LLC, List-Assist of Rochester, LLC, and Isaiah Colton (collectively “Defendants”) in the above referenced matter.

Defendants submit this letter to respectfully request a modification of the briefing schedule for Plaintiffs’ Motion for Partial Summary Judgment (*see* Dkt. No. 90). Counsel for Plaintiffs and Defendants conferred, and Plaintiffs consent to Defendants’ request.

On October 8, the Court issued an Order (Dkt. No. 101) setting October 29, 2021 as the deadline for Defendants to file their opposition to Plaintiffs’ motion for summary judgment, and November 19, 2021 as the date for Plaintiffs to file any responsive papers. Due to a recent unforeseen and particularly tragic passing in the family of the attorney directly handling this matter for the Defendants (Ross Greenky), we reached out to Plaintiffs’ counsel seeking their consent to amend the current scheduling order, and the parties have agreed as follows:

Defendants’ opposition to the summary judgment motion shall be due ***November 19, 2021***, and Plaintiffs’ reply to the opposition, if any, shall be due by ***December 17, 2021***.

If the above proposal meets with your Honor’s approval, a “So Ordered” line is provided at the bottom of this letter for the Court’s convenience.

Hon. Elizabeth A. Wolford, U.S.D.J.

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Thank you very much for your consideration.

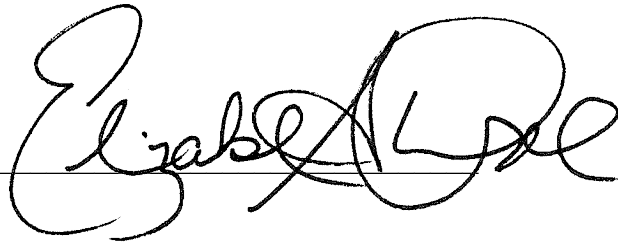
Respectfully submitted,

/s/ Scott P. Rogoff

Scott P. Rogoff

cc: Ross M. Greenky, Esq. (via e-mail)
Adam Sanderson, Esq. (via e-mail)
Michael J. Lingle, Esq. (via e-mail)

SO ORDERED:

A handwritten signature in black ink, appearing to read "Elizabeth A. Wolford", written over a horizontal line.

Honorable Elizabeth A. Wolford

Chief Judge

United States District Court

Dated: October 28, 2021